

## REMARKS

Favorable reconsideration of this application is respectfully requested in view of the following remarks.

At the outset, appreciation is expressed to Examiner Butler for his time and attention during the interview that was conducted at the U.S. Patent and Trademark Office on February 18, 2005. The remarks below discuss the substance of the interview.

The specification has been amended to address the typographical error kindly noted by Examiner Butler. Also, the Abstract of the Disclosure has been amended to delete the term "means" and to delete portions of the original Abstract of the Disclosure for purposes of meeting the 150 word limit.

In light of the forgoing, withdrawal of the objections to the specification and the Abstract of the Disclosure is respectfully requested.

Claims 3, 4, 8, 9, 13 and 14 remain withdrawn from further consideration as being directed to the non-elected species. By way of this Amendment, Claims 6, 7 and 10 have been canceled. The subject matter recited in those claims has been incorporated into the respective independent claims. Claims 1, 2, 5, 11 and 12 remain readable on the elected species.

The issue raised on page two of the Official Action concerning the wording in Claims 7 and 10 has been addressed. Thus, withdrawal of the claim rejection based on the second paragraph of 35 U.S.C. § 112 is respectfully requested.

As discussed during the interview, the claims in this application are directed to a hydraulic brake device. As recited in independent Claim 1, the hydraulic brake device includes a pressurized fluid generator which generates pressurized fluid

supplied to plural brakes which respectively restrict the rotations of road wheels, a solenoid block mounted on the pressurized fluid generator and containing plural solenoid valves, and an ECU provided with a control board for controlling the solenoid valves to distribute pressurized fluid to the brakes, wherein the solenoid block and the ECU are constructed to be an integrated structure.

Independent Claim 2 defines the hydraulic brake device in terms of a master cylinder which generates pressurized fluid supplied to brakes, a fluid booster which assists the master cylinder in generating the pressurized fluid, a solenoid block mounted on a mounting portion provided on the master cylinder and containing plural solenoid valves therein and an ECU provided with a control board for controlling the solenoid valves to distribute pressurized fluid to the plural, wherein the solenoid block and the ECU are constructed to be an integrated structure.

The last independent claim currently under consideration, Claim 5, recites a hydraulic brake device having a master cylinder which generates a fluid pressure signal corresponding to a brake manipulation force, a hydraulic pump provided bodily with the master cylinder and driven by an electric motor in dependence on the fluid pressure signal indicative of the brake manipulation force for generating pressurized fluid supplied to plural brakes independently of the master cylinder, a solenoid block mounted on a mounting portion provided on the master cylinder and provided with plural solenoid valves, and an ECU provided with a control board for controlling the solenoid valves to distribute pressurized fluid to the plural brakes. As claimed, the solenoid block and the ECU are constructed to be an integrated structure.

As set forth in the Official Action and explained during the interview, the phrase "integrated structure" as recited in independent Claims 1, 2 and 5 to define the

construction of the solenoid block and the ECU has been interpreted quite broadly and not in a manner requiring any particular features, structure or arrangement. Considering this position, and to more clearly differentiate the claimed hydraulic brake device at issue here over the disclosures contained in the documents relied upon in the Official Action, Claims 1, 2 and 5 have been amended to recite that the ECU is secured to the solenoid block by screw bolts arranged in the area inside the external form of the control board contained in the case of the ECU.

As explained during the interview, the documents relied upon in the Official Action -- U.S. Patent No. 5,466,055 to *Schmitt et al.*, U.S. Patent No. 6,132,011 to *Iwamura et al.* and U.S. Patent No. 5,988,767 to *Inoue et al.* -- do not disclose a hydraulic brake device having the claimed construction. That is, none of the applied documents discloses a hydraulic brake device having the claimed combination and arrangement of features, including the solenoid block and ECU secured to each other by screw bolts arranged in the manner recited. This construction is advantageous as mentioned in the application.

For the reasons discussed during the interview and outlined above, it is believed that the independent claims currently under consideration are allowable. Accordingly, withdrawal of the rejections of record and allowance of this application are earnestly solicited.

Should any questions arise in connection with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful

in resolving any remaining issues pertaining to this application the undersigned respectfully requests that he be contacted at the number indicated below.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

Date: March 7, 2005

By: Matthew L. Schneider  
Matthew L. Schneider  
Registration No. 32,814

P.O. Box 1404  
Alexandria, Virginia 22313-1404  
(703) 836-6620